

1 MICHELE BECKWITH
2 Acting United States Attorney
3 ROBERT L. VENEMAN-HUGHES
4 Assistant United States Attorney
5 2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099
Attorneys for Plaintiff
United States of America

6 IN THE UNITED STATES DISTRICT COURT

7 EASTERN DISTRICT OF CALIFORNIA

8 UNITED STATES OF AMERICA,

9 Plaintiff,

10 v.

11 JAMAR JONES et al,

12 Defendants.

CASE NO. 1:24-CR-00209-KES-BAM

13 STIPULATION TO CONTINUE STATUS
CONFERENCE; AND ORDER

14 IT IS HEREBY STIPULATED by and between Michele Beckwith, Acting United States Attorney
15 and Robert L. Veneman-Hughes, Assistant U.S. Attorney, as well as Eric Kersten, attorney for defendant
16 JAMAR JONES, and Anthony Capozzi, attorney for defendant STEPHANIE FERREIRA, and Steven
17 Crawford, attorney for defendant JERMEN RUDD that the status conference set for March 26, 2025 at 1:00
18 pm before the Honorable Barbara A. McAuliffe be continued to May 14, 2025 at 1:00 p.m.

20 **STIPULATION**

21 Plaintiff United States of America, by and through its counsel of record, and defendants, by and
22 through defendants' counsel of record, hereby stipulate as follows:

23 1. The parties need additional time to further investigate/explore matters related to resolving
the case or setting a trial date.

24 2. Particularly, the government just provided some additional discovery to defendants
pursuant to defense discovery requests. The defendants have requested plea offers from the government,
25 which the government anticipates will be extended by April 15, 2025. Because of the nature and
26 27 28

1 circumstances of this case, more time is required to extend plea offers than in other, similar cases.

2 3. By this stipulation, the parties now move to continue the status conference, and to
3 exclude time from March 26, 2025 to May 15, 2025.

4 4. The parties agree and stipulate, and request that the Court find the following:

5 a) The government has represented that the initial discovery associated with this
6 case includes investigative reports, and related documents, photographs, etc., in electronic form.
7 All of this discovery has been either produced directly to counsel and/or made available for
8 inspection and copying. Defense would like additional time to review discovery, and investigate
9 the foundation for a resolution by plea or trial further.

10 b) The government does not object to the continuance.

11 c) An ends-of-justice delay is particularly apt in this case because:

- 12 • Defendant needs additional time to review discovery, and conduct additional
13 investigation; and
- 14 • The parties need additional time to investigate/explore matters related to
15 proceeding via plea or trial.

17 d) Based on the above-stated findings, the ends of justice served by continuing the
18 case as requested outweigh the interest of the public and the defendant in a trial within the
19 original date prescribed by the Speedy Trial Act.

20 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
21 et seq., within which trial must commence, the time period of March 26, 2025 to May 14, 2025,
22 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv) because
23 it results from a continuance granted by the Court at defendants' request on the basis of the
24 Court's finding that the ends of justice served by taking such action outweigh the best interest of
25 the public and the defendants in a speedy trial.

5. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

Dated: March 17, 2025

Respectfully submitted,

MICHELE BECKWITH
Acting United States Attorney

By /s/ Robert L. Veneman-Hughes
ROBERT L. VENEMAN-HUGHES
Assistant United States Attorney

Dated: March 17, 2025

/s/ Eric Kersten
ERIC KERSTEN
Attorney for Defendant Jamar JONES

Dated: March 17, 2025

/s/ Anthony Capozi
ANTHONY CAPOZZI
Attorney for Defendant Stephanie FERREIRA

Dated: March 17, 2025

/s/ Steven Crawford
STEVEN CRAWFORD
Attorney for Defendant Jermen RUDD

ORDER

IT IS SO ORDERED that the status conference is continued from March 26, 2025, to **May 14, 2025**, at **1:00 p.m.** in **Courtroom 8** before **Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: **March 19, 2025**

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE